

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA

UNITED STATES OF AMERICA,

CRIMINAL No: 19cr190

VS.

JAMAL KNOX,

Electronically Filed

Defendant.

MOTION TO CONTINUE SENTENCING

AND NOW COMES, the Defendant, Jamal Knox, by and through his counsel, Patrick K. Nightingale, Esquire, who brings the within Motion and in support thereof, avers as follows:

1. Sentencing in this matter is scheduled for January 17, 2024.
2. Within counsel respectfully requests a thirty day continuance. Defendant is housed at NEOCC in Youngstown, OH. Within counsel's plans to visit during the week after Christmas was scuttled due to illness. Counsel's schedule does not permit him to visit until January 8, 2024, to review this Honorable Court's Opinion on Defendant's Objections to the Pre-Sentence Report.
3. Within counsel believes and, therefore, avers that the continuance is necessary as Defendant's advisory guidelines range is 235 – 293 months incarceration.
4. Brendan Conway, Esq., objects to the relief requested citing Defendant's efforts to obstruct justice and intimidate witnesses.
5. Within counsel is unaware of any efforts to obstruct justice or intimidate witnesses since Defendant has been lodged at NEOCC in February, 2023.

WHEREFORE, the Defendant, Jamal Knox, respectfully requests that this Honorable Court grant the within Motion to Continue Sentencing for approximately thirty (30) days.

Respectfully Submitted,

/s/ Patrick K. Nightingale

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